

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

MASONITE CORPORATION,

Plaintiff,

v.

CRAFTMASTER MANUFACTURING, INC.,

Defendant.

Case No.: 1:09-cv-02131

COMPLAINT FOR PATENT
INFRINGEMENT

JURY TRIAL DEMANDED

**MASONITE CORPORATION'S
FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Masonite Corporation ("Masonite") for its First Amended Complaint against CraftMaster Manufacturing, Inc. ("CMI"), hereby avers that:

1. Masonite is a corporation of the State of Delaware and has a place of business at 1955 Powis Road, West Chicago, Illinois 60185, within this district.
2. CMI is, upon information and belief, a corporation of Delaware, having a place of business at 500 W. Monroe St., Suite 2100, Chicago, Illinois 60661, within this district.
3. This is a complaint for patent infringement and this Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338.
4. Venue is proper pursuant to 28 U.S.C. §§ 1391 and 1400.
5. On February 28, 2006, U.S. Patent No. D516,225 ("the '225 patent") was duly and lawfully issued to Masonite as assignee for an invention entitled "DOOR FACING". A copy of the '225 patent is appended hereto as Exhibit A.
6. On February 28, 2006, U.S. Patent No. D516,226 ("the '226 patent") was duly and lawfully issued to Masonite as assignee for an invention entitled "DOOR

FACING”. A copy of the ‘226 patent is appended hereto as Exhibit B.

7. On February 15, 2005, U.S. Patent No. D501,931 (“the ‘931 patent”) was duly and lawfully issued to Jeld-Wen, Inc. as assignee for an invention entitled “DOOR PANEL.” A copy of the ‘931 patent is appended hereto as Exhibit C. The ‘931 patent was duly and legally assigned to Masonite on October 19, 2009.

8. Masonite has been and still is the owner of the ‘225 patent and of the ‘226 patent. Masonite is the owner of the ‘931 patent.

9. The ‘225 patent is in full force and effect, the ‘226 patent is in full force and effect, and the ‘931 patent is in full force and effect.

10. Masonite has given CMI written notice of the ‘225 patent and of the ‘226 patent. Masonite hereby gives CMI notice of its infringement of the ‘931 patent.

11. CMI has been and still is infringing the ‘225 patent and the ‘226 patent by making, using, offering to sell, and selling door facings (including the Cashal door facings) within this district embodying the patented inventions and will continue to do so unless enjoined by this Court.

12. CMI has been and still is infringing the ‘931 patent by making, using, offering to sell, and selling door panels (including the Cashal door facings) within this district embodying the patented invention and will continue to do so unless enjoined by this Court.

13. Upon information and belief, CMI’s infringement of the ‘225 patent, the ‘226 patent, and the ‘931 patent has been willful.

WHEREFORE,

Masonite demands as judgment against CMI:

1. A preliminary injunction enjoining CMI and those in concert and participation with it from infringing the '225 patent, the '226 patent, and the '931 patent (35 U.S.C. § 283);

2. A permanent injunction enjoining CMI and those in concert and participation with it from continuing to infringe the '225 patent, the '226 patent, and the '931 patent (35 U.S.C. § 283);

3. Damages of no less than a reasonable royalty for infringement of the '225 patent, the '226 patent, and the '931 patent (35 U.S.C. § 284);

4. Damages of no less than CMI's total profit for infringement of the '225 patent, the '226 patent, and the '931 patent (35 U.S.C. § 289);

5. A finding that this case is exceptional (35 U.S.C. § 285);

6. Increased and trebled damages on account of willful infringement (35 U.S.C. § 284);

7. Attorney fees (35 U.S.C. § 285);

8. Its costs; and

9. Such other and further relief as the Court deems appropriate.

Masonite demands a trial by jury pursuant to Rule 38, Fed. R. Civ. P.

Dated: December 11, 2009

Respectfully submitted,

/s/ James A. Shimota

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2009, I electronically filed with the Clerk of Court a true and correct copy of the foregoing *Masonite Corporation's First Amended Complaint for Patent Infringement* using the CM/ECF system, which sent notification of such filing to the participants.

/s/ James A. Shimota

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